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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Robert J. Brinkmann
Vice President and Counsel
Postal and Regulatory Affairs

August 21, 2001

Mr. George Omas
Acting Chairman
Postal Rate Commission
1333 H Street, NW, Suite 300
Washington, DC 20268-0001

BY HAND

Re: *Review of Sunset Rules, Docket No. RM2001-3*

Dear Mr. Chairman:

This letter is written in response to Order No. 1319 (issued July 18, 2001). The Newspaper Association of America encourages the Commission to reissue the now-expired rules providing for expedited consideration of certain changes to Express Mail rates and for certain classification changes.

The former rules were the result of a thoughtful and considered process. They reflected a sound balance between the Postal Service's desire for greater flexibility and the Commission's commitment to ensuring that postal rates cover costs and a fair share of overhead. In particular, the rules benefited all mailers by keeping the focus where it belonged and ensuring that the Postal Service use any increased flexibility to seek to increase its net revenue, and not merely expand its volumes – the wisdom of which the Postal Service's current financial difficulties hammers home.

At a time when the Postal Service calls for greater pricing freedom, it is inexplicable that it made little effort to use rules that were on the books for many years, and made no effort to prevent their expiration. In any case, the new rules should be retained. Although the now-expired rules may not have allowed the Postal Service to curry favor with big mailers by rushing special cut-rate deals through the process on an expedited basis, they provided a desirable option to the standard procedures. That the Postal Service may, perhaps for strategic reasons of its own, no longer want the rules does not mean that the Commission should foreclose this option in the future.

Thank you for considering our views.

Cc: Ruth Goldway
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